

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

18AB 3-23-11  
**SCANNED**

MAR 22 2011

-----X  
JEANNETTE FULLER HAUSLER, et al., :  
 :  
 : Petitioner, :  
 :  
 : -against- :  
 :  
 : JPMORGAN CHASE BANK, N.A., et al., :  
 :  
 : Garnishee-Respondents. :  
-----X  
JPMORGAN CHASE BANK, N.A., et al., :  
 :  
 : Garnishee-Respondents :  
 : and Third-Party :  
 : Petitioners, :  
 :  
 : -against- :  
 :  
 : BANCO FINANCIERO INTERNACIONAL :  
 : S.A., et al., :  
 :  
 : Adverse Claimants- :  
 : Respondents. :  
-----X

Civil Action No. 09-CV-10289 (VM)

Related to JPM Chase/Citibank Turnover  
Proceeding

In Respect of a Judgment Entered in the  
State of Florida, Case No. 02-12475-CA-09

**MOTION TO ADMIT COUNSEL  
WILFREDO A. RODRIGUEZ  
PRO HAC VICE**

FILED  
2011 MAR 22 PM 3:52  
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Court for the Southern District of New York, I, William J.F. Roll, III, a member in good standing  
of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Wilfredo A. Rodriguez  
Avila Rodriguez Hernandez Mena & Ferri LLP  
2525 Ponce de Leon Blvd., Suite 1225  
Coral Gables, Florida 33134  
Telephone: (305) 779-3560  
Facsimile: (305) 779-3561

as counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid in  
the above-captioned matter. Wilfredo A. Rodriguez is a member in good standing of the Bar of

CASE NO.: 09-cv-10289 VM

the State of Florida (Florida Bar No. 334936), as evidenced by the Certificate of Good Standing annexed to the Affidavit filed in support of this Motion. As far as I am aware, there are no pending disciplinary proceedings against Wilfredo A. Rodriguez in any State or Federal court.

Dated: March 18, 2011  
New York, New York

Respectfully submitted,

SHEARMAN & STERLING LLP

By:

  
\_\_\_\_\_  
William J.F. Roll, III

599 Lexington Avenue  
New York, NY 10022  
(212) 848-4000  
wroll@shearman.com

Attorneys for Adverse Claimant-Respondent  
CAJA DE AHORROS Y MONTE DE PIEDAD DE  
MADRID

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Petitioner,	:
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-against-	:
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JPMORGAN CHASE BANK, N.A., et al.,	:
	:
Garnishee-Respondents.	:
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JPMORGAN CHASE BANK, N.A., et al.,	:
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Garnishee-Respondents	:
and Third-Party	:
Petitioners,	:
	:
-against-	:
	:
BANCO FINANCIERO INTERNACIONAL	:
S.A., et al.,	:
	:
	:
Adverse Claimants-	:
Respondents.	:
-----X	

Civil Action No. 09-CV-10289 (VM)

Related to JPM Chase/Citibank Turnover Proceeding

In Respect of a Judgment Entered in the State of Florida, Case No. 02-12475-CA-09

**AFFIDAVIT OF WILLIAM J.F. ROLL, III IN SUPPORT OF MOTION TO ADMIT COUNSEL, WILFREDO A. RODRIGUEZ, PRO HAC VICE**

State of New York     )  
                                  )     ss:  
County of New York    )

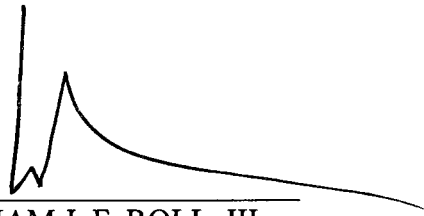
WILLIAM J.F. ROLL, III, being duly sworn, hereby deposes and says:

1. I am a member of the firm of Shearman & Sterling LLP, counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid ("Caja Madrid") in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit in support of the motion to admit Wilfredo A. Rodriguez as counsel *pro hac vice* to represent Caja Madrid in this case.

2. I am a member in good standing of the bar of the State of New York, and I was admitted to practice law in the State in January 1980. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am a member in good standing of this Court.

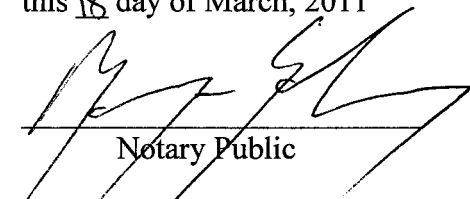
3. Mr. Rodriguez is a member of the law firm of Avila Rodriguez Hernandez Mena & Ferri LLP in Coral Gables, Florida. I have found Mr. Rodriguez to be a skilled attorney and a person of integrity. I understand that he is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. Annexed hereto as Exhibit A is a copy of a Certificate of Good Standing averring that Mr. Rodriguez is a member in good standing of the Bar of the State of Florida.

4. Accordingly, I am pleased to move the admission of Wilfredo A. Rodriguez *pro hac vice*, in this case. A proposed order granting the admission of Wilfredo A. Rodriguez, *pro hac vice*, is annexed hereto as Exhibit B.

  
\_\_\_\_\_  
WILLIAM J. F. ROLL, III

State of NY  
County of NY

Sworn to before me  
this 18<sup>th</sup> day of March, 2011

  
\_\_\_\_\_  
Notary Public

BRYAN JANKAY  
Notary Public, State of New York  
No. 01JA6172051  
Qualified in Nassau County  
Certificate filed in New York County  
Commission Expires August 6, 2011



## The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 334936  
Wilfredo A. Rodriguez  
Avila Rodriguez Hernandez, et al  
2525 Ponce De Leon Blvd., Ste. 1225  
Coral Gables, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on November 19, 1981.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 9<sup>th</sup> day of March, 2011.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/ecW:R10

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
JEANNETTE FULLER HAUSLER, et al.,	:	
	:	
Petitioner,	:	
	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A., et al.,	:	Civil Action No. 09-CV-10289 (VM)
	:	
Garnishee-Respondents.	:	Related to JPM Chase/Citibank Turnover
-----	X	Proceeding
JPMORGAN CHASE BANK, N.A., et al.,	:	
	:	In Respect of a Judgment Entered in the
Garnishee-Respondents	:	State of Florida, Case No. 02-12475-CA-09
and Third-Party	:	
Petitioners,	:	<b>ORDER FOR ADMISSION</b>
	:	<b>PRO HAC VICE</b>
-against-	:	<b>ON WRITTEN MOTION</b>
	:	
BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al.,	:	
	:	
Adverse Claimants-	:	
Respondents.	:	
-----	X	

Upon the motion of William J.F. Roll, III, counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid, and his sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Wilfredo A. Rodriguez  
Avila Rodriguez Hernandez Mena & Ferri LLP  
2525 Ponce de Leon Blvd., Suite 1225  
Coral Gables, Florida 33134  
Telephone: (305) 779-3560  
Facsimile: (305) 779-3561  
frodriguez@arhmf.com

CASE NO.: 09-cv-10289 VM

is admitted to practice *pro hac vice* as counsel for Adverse Claimant-Respondent Caja de Ahorros y Monte de Piedad de Madrid in the above-captioned case in this Court. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: March \_\_, 2011  
New York, New York

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Hon. Victor Marrero  
U.S.D.J.



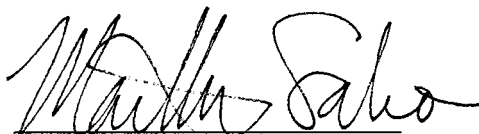
**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
Petitioner,	:	
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-against-	:	
	:	
JPMORGAN CHASE BANK, N.A., et al.,	:	Civil Action No. 09-CV-10289 (VM)
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-----X	:	Proceeding
JPMORGAN CHASE BANK, N.A., et al.,	:	
	:	In Respect of a Judgment Entered in the
Garnishee-Respondents	:	State of Florida, Case No. 02-12475-CA-09
and Third-Party	:	
Petitioners,	:	<b>CERTIFICATE OF SERVICE</b>
	:	
-against-	:	
	:	
BANCO FINANCIERO INTERNACIONAL	:	
S.A., et al.,	:	
	:	
Adverse Claimants-	:	
Respondents.	:	
-----X	:	

I, Martha C. H. Sabo, hereby certify that on March 22, 2011, I caused a true and correct copy of the Motion to Admit Counsel Wilfredo A. Rodriguez *Pro Hac Vice* and Affidavit of William J.F. Roll, III in Support of same to be served on the counsel of record listed on the attached service list, via U.S. Mail and electronic mail. In addition, I certify that I caused a true and correct copy of the foregoing Motion and Affidavit to be served via U.S. Mail on the following counsel of record:

James D. Pagliaro  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

Dated: March 22, 2011  
New York, New York

  
 Martha C. H. Sabo

**SERVICE LIST**

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**Roberto Martinez**

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